

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

Plaintiff,

v.

DoorDash, Inc. and Caviar, LLC,

Defendants,

Case No.: 1:21-cv-05162

Hon. Jeremy C. Daniel

Magistrate Judge Jeffrey T. Gilbert

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A REPLY IN  
SUPPORT OF ITS MOTION TO COMPEL DOCUMENT DISCOVERY FROM FOUR  
ADDITIONAL CUSTODIANS**

Plaintiff City of Chicago (the “City”) hereby submits this Unopposed Motion for Extension of Time to File a Reply in Support of Its Motion to Compel. The City seeks a one-week extension of the current deadline, to March 18, 2024. In support thereof, the City states the following:

1. On February 2, 2024, Plaintiffs moved to compel document discovery from four additional custodians. ECF No. 254. The motion seeks a court order that Defendants produce certain additional custodians.
2. On February 23, 2024, Defendants filed their Opposition to Plaintiff's Motion to Compel. ECF No. 287.
3. On February 5, 2023, the City emailed the court with the briefing schedule agreed upon by the parties for the City's Motion to Compel Additional Custodians, which directed the City to reply by March 11, 2024.
4. Good cause exists for the requested extension of time.

5. Due to illness of the attorney principally tasked with preparing the City's reply, and the press of other deadlines in this case, the City seeks a short extension of time to fully assess and respond to Defendants' arguments.

6. Accordingly, Plaintiff respectfully requests leave to file its forthcoming reply brief no later than March 18, 2024.

7. Defendants' counsel have informed the City that Defendants do not oppose the City's request for an extension of time.

8. This Motion is timely filed, made in good faith and not for purposes of delay, and will not prejudice any party.

WHEREFORE, Plaintiff City of Chicago respectfully requests that the Court grant this unopposed Motion and enter an Order extending the deadline for the City's Reply to its Motion to Compel Additional Document Custodians to March 18, 2024.

DATED: March 5, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,  
AFFIRMATIVE LITIGATION DIVISION**

By: /s/ Stephen J. Kane

Stephen J. Kane  
Peter H. Cavanaugh  
121 N. LaSalle Street  
Room 600  
Chicago, IL 60602  
Phone: (312) 744-6934  
stephen.kane@cityofchicago.org  
peter.cavanaugh@cityofchicago.org

**COHEN MILSTEIN SELLERS &  
TOLL PLLC**

By: /s/ Brian E. Bowcut

Brian E. Bowcut (*pro hac vice*)  
Peter Ketcham-Colwill (*pro hac vice*)  
1100 New York Avenue, NW, Suite 500  
Washington, D.C. 20005  
Phone: (202) 408-4600  
bbowcut@cohenmilstein.com  
pketcham-colwill@cohenmilstein.com

Lisa Ebersole (*pro hac vice*)

88 Pine St. 14th floor  
New York, NY 10005  
Phone: (212) 838-7797  
lebersole@cohenmilstein.com

*Attorneys for Plaintiff City of Chicago*

**CERTIFICATE OF SERVICE**

I certify that on March 5, 2024, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of Illinois using the Court's CM/ECF system, which will automatically send notification of this filing to all counsel of record.

/s/ Brian E. Bowcut